

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA (READING)**

In Re:

Case No. 17-12550-REF

PATRICK J. LYONS,

Chapter 13

Debtor(s).

REQUEST FOR SPECIAL NOTICE AND SERVICE OF COPIES

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that ALDRIDGE PITE, LLP submits this Request for Special Notice and Service of Copies, for Bank of America, N.A. and hereby requests special notice of all events relevant to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

ALDRIDGE PITE, LLP, submits this Request for Notice and Service of Copies as agent for Bank of America, N.A. and not as counsel of record.

ALDRIDGE PITE, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

Jamie D. Hanawalt
ALDRIDGE PITE, LLP
4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, CA 92177-0933

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of

the within party's:

- a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;
- b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant proceeding by Fed. R. Bankr. P. 7004. This Request for Special Notice shall not operate as a confession and/or concession of jurisdiction. Moreover, the within party does not authorize ALDRIDGE PITE, LLP, either expressly or impliedly through ALDRIDGE PITE, LLP's participation in the instant proceeding, to act as its agent for purposes of service under Fed. R. Bankr. P. 7004;
- c. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;
- d. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

Dated: May 25, 2017

ALDRIDGE PITE, LLP

/s/ Jamie D. Hanawalt
Jamie D. Hanawalt
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4375 Jutland Dr., Suite 200
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PATRICK J. LYONS,

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Chapter 13

PROOF OF SERVICE

I, Lauren Timby, declare that:

I am employed by Aldridge Pite, LLP. My business address is: 4375 Jutland Drive, Suite 200; P.O. Box 17933, San Diego, CA 92177-0933. I am over the age of eighteen years and not a party to this cause.

On May 25, 2017, I served the REQUEST FOR SPECIAL NOTICE AND SERVICE OF COPIES in said cause by electronic means through the court's CM/ECF system or by placing true and correct copies thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States Mail at San Diego, California, addressed as follows: SEE ATTACHED SERVICE LIST.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 25, 2017

/s/ Lauren Timby
LAUREN TIMBY

SERVICE LIST

DEBTOR(S)
(VIA U.S. MAIL)

Patrick J. Lyons
35 Iris Circle
Lancaster, PA 19601

DEBTOR(S) ATTORNEY
(VIA ELECTRONIC NOTICE)

ALAINE V. GRBACH
Alaine V. Grbach, Esquire
675 Estelle Drive
Lancaster, PA 17601
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CHAPTER 13 TRUSTEE
(VIA ELECTRONIC NOTICE)

FREDERICK L. REIGLE
Chapter 13 Trustee
2901 St. Lawrence Ave.
P.O. Box 4010
Reading, PA 19606
ecfmail@fredreigle13.com

UNITED STATES TRUSTEE
(VIA ELECTRONIC NOTICE)

Department of Justice
Eastern District of Pennsylvania - Reading
400 Washington Street
Reading, PA 19601